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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

VANESA ARAUZA,

Defendants.

CASE NO. 1:22-CR-00305-JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

CURRENT DATE: April 29, 2024
TIME: 9:00 a.m.

COURT: Hon. JENNIFER L. THURSTON

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a change of plea hearing on April 29, 2024. The parties agree to continue the upcoming change of plea hearing to July 1, 2024, at 9:00 a.m. and to exclude Speedy Trial time between April 29, 2024, and July 1, 2024.
2. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes body-worn camera, investigative reports, photographs, aerial surveillance video, audio records, and other evidence. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying. In addition, the government has confidential discovery that it has made available to defense at the government's office.
 - b) The government has relayed a plea agreement to defense counsel, who needs

1 additional time to review the agreement, meet with his client, conduct further research and
2 investigation, and prepare for the change of plea hearing.

3 c) Counsel for defendant believes that failure to grant the above-requested
4 continuance would deny him the reasonable time necessary for effective preparation, taking into
5 account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of April 29, 2024 to July 1, 2024,
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) because it results
13 from a continuance granted by the Court at defendant's request on the basis of the Court's
14 finding that the ends of justice served by taking such action outweigh the best interest of the
15 public and the defendant in a speedy trial.

16 3. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

19 IT IS SO STIPULATED.

20
21 Dated: April 22, 2024

PHILLIP A. TALBERT
United States Attorney

23 /s/ JUSTIN J. GILIO
24 JUSTIN J. GILIO
Assistant United States Attorney

25
26 Dated: April 22, 2024

/s/ Ryan Roth

27 Ryan Roth
Counsel for Defendant
28 Vanessa ARAUZA

ORDER

IT IS SO ORDERED.

Dated: **April 24, 2024**


UNITED STATES DISTRICT JUDGE